

WEST VIRGINIA STRONG

The Comeback

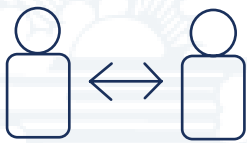


Guidance for Malls and Similar Facilities

Issued on May 18, 2020

Guidance for Malls and Similar Facilities

Under Gov. Justice's reopening plan, **West Virginia Strong — The Comeback**, malls are to be allowed to resume operations, along with specialty retail businesses, on Thursday, May 21, 2020. To do so, Gov. Justice has issued the following guidance to mitigate the exposure and spread of COVID-19 among staff and patrons. These guidelines, in addition to any and all relevant guidelines established by the Centers for Disease Control (CDC), will help West Virginians safely obtain the services provided by such facilities. These facilities are encouraged to implement more stringent or comprehensive protocols as they see fit.



As your business reviews and implements these new measures, we encourage you to share and discuss them with your employees and your patrons. Communicating enhanced cleaning and sanitization practices will make staff and patrons feel more confident in your facilities.

Please note: The following guidelines are being published in advance of Governor Justice's Executive Order — currently anticipated to be effective as of May 21, 2020 — that will allow for the opening of specialty retail businesses, and is deemed to include malls and similar facilities that may host or provide space to retailers, restaurants, and other businesses.

Note further: Malls and similar facilities should also consult A Guide to Reopening Larger Retail Stores, available at governor.wv.gov, to determine other best practices.

Failure to adhere to these guidelines may result in appropriate enforcement measures.

GUIDANCE FOR MALLS AND SIMILAR FACILITIES

OPERATIONAL RESTRICTIONS/REQUIREMENTS:

- **Plan:** Develop and implement appropriate policies, in accordance with federal, state, and local regulations and guidance, and informed by industry best practices:
 - Prepare the building for reopening;
 - Coordinate with all tenants, staff, and building landlords/building management to establish a clear policy with respect to who will be responsible for managing occupancy across the mall and within each particular store or other business;
 - Coordinate with all tenants, staff, and building landlords/building management to establish a clear policy with respect to who will be responsible for cleaning and sanitizing common areas, touch points, stores fronts, and areas within such stores and other businesses;
 - Prepare your employees for their return to work;
 - Create a social distancing plan to manage and reduce excessive contact and interaction;
 - Create a plan for personal protective equipment;
 - Reduce touch points to the maximum extent possible;
 - Increase cleaning frequency and the availability of hand sanitizer, disinfectant wipes, and other DIY cleaning products to ensure touch points and training and sports equipment are properly sanitized between each use; and
 - Establish an open line of communication with employees, tenants, business owners, and landlords/building management regarding safety.
- **Landlords/Center Management:** Consider traffic flow and occupancy limitations: Should walking patterns be changed to be one way?
 - Does the number of entrances need to be limited to control occupancy?
 - Do the entrances and exits need to be staffed to manage occupancy?
 - Are you making any changes to parking to accommodate curbside pickup?
 - How are you managing tenants' requests to help with social distancing and/or queuing requirements?
- Consider common area adjustments to determine whether children's play areas should be open, if seating needs to be rearranged or furniture removed to accommodate social distancing, etc.
- Close common elements such as drinking fountains and any self-serve soda machines.
- Upgrade cleaning and hygiene practices:
 - Increase cleaning frequency and focus on disinfecting areas most susceptible to the spread of viral germs (children's play areas, public restrooms, common seating areas, rental strollers and wheelchairs, door handles, escalator handrails, food court tables, and any other places the public commonly touches).
- Install and maintain alcohol-based, hand-cleaning dispensers in locations where the spread of germs is likely and normal soap-and-water handwashing stations are not readily available.
- Determine whether you will provide facial masks and/or gloves to patrons for use while in-store or on the property.
- Consider your staffing levels: What are your general expectations for crowds when you reopen?
 - Are you changing your hours of operations?
 - Are staffing levels adequate to address additional cleaning and sanitation requirements?
 - Are you doing anything to increase the visibility of your cleaning staff or cleaning practices?

GUIDANCE FOR MALLS AND SIMILAR FACILITIES

- **Retail Tenants:** Retail tenants should consult A Guide to Reopening Larger Retail Stores, available at governor.wv.gov, to determine other best practices for their operations.
- **Restaurant Tenants:** Restaurant tenants should consult A Guide to Safely Opening Restaurants, available at governor.wv.gov, to determine other best practices for their operations.

Where employees must come into contact with the general public and/or customers, the employer should consider additional precautionary measures to protect the safety of their employees, customers, and the citizens of the State of West Virginia.

- Establish limitations on existing occupancy limits with consideration for the limit of 2 persons per 1000 square feet by the West Virginia DHHR;
- Enforce reasonable and appropriate social distancing requirements in all areas of the business;
- Implement, to the greatest extent possible, internal traffic flow patterns necessary to minimize contacts between employees and customers;
- As appropriate, establish an appointment schedule to reduce excessive or unnecessary interaction;
- To the greatest extent possible, encourage customers to make orders over the phone or online and arrange for contactless payment, pickup, and delivery;
- To the greatest extent possible, encourage customers to make cashless and/or contactless payments and ensure point of sale equipment is frequently sanitized;
- Institute measures to limit interaction between employees and customers including the use of plastic shields; and
- Require PPE, including appropriate face coverings, for all employees with special considerations for those employees who will interact with a customer.